

Re: Carrasquillo v. Westech Security and Investigation Inc. (1:23-cv-04931-MKV)

Abbie Sebastianelli <asebastianelli@cervinilawgroup.com>

Tue 1/16/2024 6:02 PM

To: Robert Kansao <robert@leelitigation.com>

Cc: CK Lee <cklee@leelitigation.com>; Joseph Cervini <jcervini@cervinilawgroup.com>

Good Evening,

Defendant has fully complied with the Court's Order dated December 6, 2023 (the "**Order**"). The Order provides as follows:

Accordingly, the Court ordered that Defendant provide Plaintiff with its Rule 26 initial disclosures on or before December 13, 2023. The Court further ordered that Defendant produce all records relating to Plaintiff Ana Carrasquillo, including any and all time sheets and/or wage records relating to Plaintiff, by December 20, 2023. The Court also cautioned Plaintiff that preemptively pleading boilerplate and conclusory class allegations and/or conditional Fair Labor Standards Act collective allegations would not permit Plaintiff to expand the universe of discovery.

On December 13, 2023, in accordance with the Order, Defendant served its Rule 26 Initial Disclosures. Subsequently, on December 20, 2023, Defendant produced all responsive documents relating to Plaintiff. The Order contains no further discovery obligations for Defendant at this time, nor does it permit Plaintiff to seek additional discovery. Therefore, any further discovery requests without prior permission of the Court is a violation of the Order.

We are prepared to meet and confer tomorrow to discuss any concerns or clarifications regarding the Initial Disclosures and the discovery that has been produced thus far.

On Fri, Jan 12, 2024 at 3:35 PM Robert Kansao <[robert@leelitigation.com](mailto:robert@leelitigation.com)> wrote:

Good Afternoon

In advance of Wednesday's meet and confer, I am providing the attached additional notices of deposition.

I would like to find mutually agreeable days to take depositions of all noticed individuals, including Defendant's 30(b)(6) witness. Please be prepared with dates of availability.

Thank you,

Robert A Kansao

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